

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth.**

**REPLY OF THE COMMONWEALTH OF PUERTO RICO TO RESPONSE FILED BY  
CLAIMANT CARMEN R. LÓPEZ CAMACHO [ECF NO. 19429] TO THE THREE  
HUNDRED EIGHTY-THIRD OMNIBUS OBJECTION (SUBSTANTIVE) TO  
EMPLOYEE CLAIMS ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE  
NOT TITLE III DEBTORS**

**To the Honorable United States District Court Judge Laura Taylor Swain:**

The Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Economic Stability Act* (“PROMESA”),<sup>2</sup> files this reply (the “Reply”) to the *Replica de Objeción Global* [ECF No. 19429] (the “López Camacho Response”) filed by Carmen R. López Camacho (“López Camacho”) and in support of the *Three Hundred Eighty-Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17922] (the “Three Hundred Eighty-Third Omnibus Objection”), and in support of the Reply, respectfully states as follows:

1. On August 20, 2021, the Debtors filed the Three Hundred Eighty-Third Omnibus Objection seeking to disallow claims asserting liabilities associated with allegedly unpaid wages or other employment benefits purportedly owed by entities that are not Title III debtors, but which fail to comply with the applicable rules by not providing a basis for asserting a claim against the Commonwealth or any other Title III Debtor, each as listed on Exhibit A thereto.

2. Any party who disputed the Three Hundred Eighty-Third Omnibus Objection was required to file a response by 4:00 p.m. (Atlantic Standard Time) on September 20, 2021, in accordance with the Court-approved notices attached to the Three Hundred Eighty-Third Omnibus Objection as Exhibit C, which were served in English and Spanish on the individual creditors subject to the Three Hundred Eighty-Third Omnibus Objection, the U.S. Trustee, and the Master Service List (as defined in the *Fifteenth Amended Case Management Procedures* [ECF No. 17127-1]). *See Certificate of Service* [ECF No. 17989].

3. López Camacho filed a proof of claim against the Commonwealth on June 10, 2021, and it was logged by Prime Clerk as Proof of Claim No. 179349 (the “López Camacho Claim”). The López Camacho Claim purports to assert liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Telephone Company.

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101–2241.

4. The López Camacho Response was filed on December 6, 2021, and logged as ECF No. 19429 on December 7, 2021. Therein, López Camacho states that “[t]he Court must not grant the omnibus objection since the money is pursuant to [] laws passed by the government of the Commonwealth of Puerto Rico. . . . I am claiming the increases under the laws that were signed during the period in which the P.R. Tel. Company belonged to the government of the Commonwealth. This was until 1999 when the government of Puerto Rico sold the company, and it became private.” López Camacho Response at 1-2. The López Camacho Response also enclosed documentation demonstrating López Camacho’s employment with Claro, the successor entity to the Telephone Company.

5. However, neither the López Camacho Claim nor the López Camacho Response provides a basis for asserting a claim against the Commonwealth or any other Title III Debtor in respect of allegedly accrued but unpaid wages purportedly owed by former government entities, such as the Telephone Company. Accordingly, the López Camacho Claim should be disallowed.

6. For the foregoing reasons, the Commonwealth respectfully requests the Court sustain the Three Hundred Eighty-Third Omnibus Objection and disallow the López Camacho Claim, notwithstanding the Response.

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Dated: February 2, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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